

Carl D. Crowell, OSB No. 982049
email: crowell@kite.com
CROWELL LAW
P.O. Box 923
Salem, OR 97308
(503) 581-1240
Of attorneys for plaintiffs

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

VOLTAGE PICTURES, LLC,

Plaintiff,

v.

HUNTER HARWOOD,

Defendant.

Case No.: 13-cv-00839-AA

PLAINTIFF'S
ANSWER TO COUNTERCLAIM

Plaintiff Voltage Pictures, LLC, answers and responds to the allegations of defendant in his allegations and counterclaim as follows:

Response to Allegations

1. Plaintiff admits the allegation of paragraph 71, namely that defendant denies infringing plaintiff's work.
2. As to paragraph 72, plaintiff admits the assignment at issue, filed with the U.S. Copyright office, was also filed in the referenced case in the Southern District of Georgia (and other cases) and was the basis for the substitution of Voltage Pictures, LLC for Maxcon Productions, Inc..

Plaintiff denies this is the sole basis for any claim of entitlements to rights in the motion picture *Maximum Conviction*.

3. Plaintiff admits the allegation of paragraph 73.
4. As to paragraph 74, plaintiff admits the signature is of an authorized signatory, but otherwise denies the allegations.
5. Plaintiff admits the allegation of paragraph 75.
6. Plaintiff denies the allegation of paragraph 76.
7. Plaintiff admits the allegation of paragraph 77, but denies the relevancy.
8. Plaintiff admits the allegation of paragraph 78, but denies the relevancy.
9. Plaintiff admits the allegation of paragraph 79, but denies the relevancy.
10. Plaintiff admits the allegation of paragraph 80, but denies the relevancy.
11. Plaintiff denies the allegation of paragraph 81.
12. Plaintiff admits the allegation of paragraph 82, but denies the relevancy.
13. Plaintiff denies the allegation of paragraph 83.
14. Plaintiff denies the allegation of paragraph 84.
15. Plaintiff denies the allegation of paragraph 85.
16. Plaintiff denies the allegation of paragraph 86.
17. Plaintiff denies the allegation of paragraph 87.
18. Plaintiff denies the allegation of paragraph 88.
19. Plaintiff denies the allegation of paragraph 89.
20. Plaintiff denies the allegation of paragraph 90.
21. Plaintiff denies the allegation of paragraph 91.

Answer to Defendant's Counterclaim

22. Plaintiff admits and denies the allegations relevant to paragraph 92, as per above.

- 23. Plaintiff admits the allegation of paragraph 93.
- 24. Plaintiff admits the allegation of paragraph 94.
- 25. Plaintiff denies the allegations of paragraph 95.

Except as expressly admitted herein, plaintiff denies every allegation of defendant in his allegations and counterclaim.

WHEREFORE, plaintiff requests the relief of its complaint and that defendant's counterclaim be denied in whole.

DATED: October 20, 2013

Respectfully submitted,

CROWELL LAW

/s/ Carl D. Crowell

Carl D. Crowell, OSB No. 982049

Of attorneys for the plaintiff